

ORCAS ISLAND LIBRARY DISTRICT
San Juan County, Washington
January 1, 1992 Through December 31, 1993

Schedule Of Findings

1. Orcas Island Library District Should Monitor Compliance With The Davis-Bacon Act

The district did not have a system in place to monitor compliance with the Davis-Bacon Act related to a project funded by the Public Library Construction and Technology Enhancement (LSCA Title II) grant (CFDA 84.154).

General administrative requirements for all federal assistance programs requires, among other things, compliance with the Davis-Bacon Act. The Davis-Bacon requirement states in part:

When required by Federal grant program legislation, all laborers and mechanics employed by contractors or subcontractors to work on construction projects financed by federal assistance must be paid wages not less than those established for the locality of the project by the Secretary of Labor. [40 Stat 1494, Mar. 3, 1921, Chap. 411, 40 U.S.C. 276A-276A-5].

The district's grant agreement with the Washington State Library, Assurances of Compliance, No. 13 states:

The sub-grantee will comply with the minimum wage and maximum hours provisions of the Federal Fair Labor Standards Act, "Davis-Bacon".

Based on correspondence with the Washington State Library, district personnel believed they were in compliance with Davis-Bacon Act requirements.

Without an effective system to monitor contractor compliance with prevailing wage requirements, the district cannot be assured prevailing wage rates were paid to employees of the contractor. The district is also exposed to the risk of losing future federal assistance.

We recommend the district develop a system to monitor compliance with the Davis-Bacon Act. This system should address, at a minimum, the review of certified payrolls submitted by contractors and interviews of contractor employees, to ensure prevailing wages are paid.